

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JACKSON WOMEN’S HEALTH
ORGANIZATION, on behalf of itself and its
patients,

and

SACHEEN CARR-ELLIS, M.D., M.P.H., on
behalf of herself and her patients,

Plaintiffs,

v.

THOMAS DOBBS, M.D., in his
official capacity as State Health Officer of
the Mississippi Department of Health, et al.

Defendants.

Case No. 3:18-cv-171-CWR-FKB

PLAINTIFFS’ MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Fed. R. Civ. P. 65, Plaintiffs, by and through their undersigned counsel, respectfully move this Court for a preliminary injunction enjoining Defendants from enforcing Senate Bill 2116 (“S.B. 2116”), which bans abortion after approximately 6 weeks. S.B. 2116 is scheduled to take effect July 1, 2019 and will ban nearly all pre-viability abortions in the state of Mississippi.

This Motion is supported by the Memorandum of Law in Support of Plaintiffs’ Motion for a Preliminary Injunction, a copy of S.B. 2116 (attached as Exhibit A), and the Declaration of Sacheen Carr-Ellis, M.D., M.P.H. (attached as Exhibit B).

As set out in the accompanying memorandum of law, Plaintiffs have demonstrated a substantial threat of irreparable injury, for which there is no adequate remedy at law, if S.B. 2116

is not enjoined prior to July 1, 2019. Plaintiffs' application is supported by specific facts that clearly show their entitlement to a preliminary injunction, which will prevent injury and maintain the status quo pending final resolution of the significant constitutional claims at issue. Plaintiffs respectfully request that the Court grant Plaintiffs' Motion for a Preliminary Injunction.

Respectfully submitted this 28th day of March, 2019.

/s/ Aaron Delaney

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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2019, I electronically filed the foregoing Plaintiffs' Motion for a Preliminary Injunction with the Clerk of the Court by using the Court's CM/ECF system, which will send a notice of electronic filing to all counsel of record.

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